

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MICHAEL DAVID GREENFIELD
a.k.a. MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**[AMENDED PROPOSED] ORDER GRANTING CERTAIN DISCRETIONARY RELIEF
PURSUANT TO 11 U.S.C. §§ 1521(A)(5) AND 1521(B)**

Lior Dagan, in his capacity as the Court-appointed trustee and foreign representative (“Trustee” or “Foreign Representative”) of debtor Michael David Greenfield (“Greenfield,” a.k.a. Michael David Ben-Ari, or the “Debtor”), having filed a motion for entry of an order affirming his authority to realize and take control of certain U.S.-based non-reserved identified assets of the Debtor, U.S.-based, non-reserved but unidentified assets of the Debtor that may be identified in the future (collectively the “Non-Reserved Assets”), and U.S.-based reserved, identified and unidentified, assets (conditional upon the agreement of the DOJ, which may be evidenced to the Court in a manner determined by the DOJ) and repatriate the assets to Israel in an account held by the Foreign Representative as a trustee of the Debtor (as to the motion, the “Motion”); and upon consideration of (i) the Declaration of Amiad Kushner and the exhibit attached thereto; and the Declaration of Roman Peltsman, filed concurrently herewith and in support of the Motion; and this Court having recognized the Foreign Proceeding as a “foreign main proceeding” and Lior Dagan as the Foreign Representative of the Debtor on August 5, 2021; and the Court having jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334; and this Motion being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(P); and this Court having determined that

the relief sought in the Motion is in the best interests of the Debtor, the Debtor's creditors, and all other interested parties;

The Foreign Representative now modifies the relief sought in the Motion, seeking an order affirming his authority to realize and take control of only the Non-Reserved Assets and repatriate the Non-Reserved Assets to Israel in an account held by the Foreign Representative as a trustee of the Debtor; and upon consideration of (i) the Declaration of Amiad Kushner and the exhibit attached thereto; and the Declaration of Roman Peltzman, filed concurrently herewith and in support of the Motion; and this Court having recognized the Foreign Proceeding as a "foreign main proceeding" and Lior Dagan as the Foreign Representative of the Debtor on August 5, 2021; and the Court having jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334; and this Motion being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(P); and this Court having determined that the relief sought in the Motion is in the best interests of the Debtor, the Debtor's creditors, and all other interested parties; IT IS HEREBY ORDERED THAT:

1. The relief requested in the Motion is hereby granted as set forth herein.
2. The Foreign Representative is hereby entrusted with the exclusive authority to administer, realize, and distribute the Debtor's Non-Reserved Assets pursuant to 11 U.S.C. §§ 1521(a)(5) and 1521(b) and specifically repatriate the Non-Reserved Assets to Israel.
3. This Court shall retain jurisdiction with respect to any and all matters relating to the interpretation or implementation of this Order.

Dated: _____, 2022
New York, New York

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE